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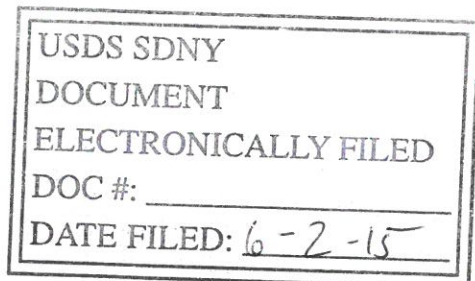
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May 28, 2015

Via E-mail

The Honorable Richard J. Sullivan
United States District Judge
Southern District of New York
500 Pearl Street, Room 640
New York, NY 10007

MEMO ENDORSED

Re: United States v. Newman, et al., S2 12 Cr. 121 (RJS)

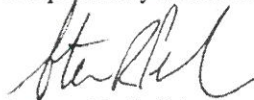
Dear Judge Sullivan:

We represent defendant Jon Horvath in this matter.

We respectfully request that the terms of Mr. Horvath's release be modified (i) to remove all restrictions on his domestic travel, (ii) to permit Mr. Horvath to travel to Canada from August 7-16, 2015, to attend the wedding of a friend, subject only to his providing Pretrial Services with advance notice of the details of this intended trip, *i.e.*, his date of intended departure, destination, and date of intended return, and (iii) to provide for Pretrial Services to return to Mr. Horvath his passport and to permit him to seek a renewal of it (as it is soon to expire).

The Government consents to these requested modifications.

Respectfully submitted,


Steven R. Peikin

cc: Harry Chernoff
(United States Attorney's Office, Southern District of New York)
(by e-mail)

SO ORDERED
Dated: 5/28/15


RICHARD J. SULLIVAN
U.S.D.J.